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10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;
16 OTTOMOTTO LLC; OTTO TRUCKING
LLC,

17 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF LINDSAY COOPER
IN SUPPORT OF PLAINTIFF WAYMO
LLC'S ADMINISTRATIVE MOTION TO
FILE UNDER SEAL ITS MOTION TO
COMPEL TEXT MESSAGES**

I, Lindsay Cooper, declare as follows:

1. I am an attorney licensed to practice in the State of California and am admitted to practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan, LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set forth in this Declaration, and if called as a witness I would testify competently to those matters.

2. I make this declaration in support of Waymo’s Administrative Motion to File Under Seal confidential information in its Motion to Compel Text Messages (“Waymo’s Administrative Motion”). Waymo’s Administrative Motion seeks an order sealing the following materials:

Document	Portions to Be Filed Under Seal	Designating Party
Waymo’s Motion to Compel Text Messages (“Waymo’s Motion”)	Highlighted in Blue	Defendants
Exhibit 2 to Waymo’s Motion	Highlighted in Blue	Defendants
Exhibit 5 to Waymo’s Motion	Entire Document	Defendants
Exhibit 6 to Waymo’s Motion	Entire Document	Defendants
Exhibit 7 to Waymo’s Motion	Highlighted in Blue	Defendants
Exhibit 8 to Waymo’s Motion	Entire Document	Defendants
Exhibit 9 to Waymo’s Motion	Entire Document	Defendants
Exhibit 10 to Waymo’s Motion	Entire Document	Defendants
Exhibit 11 to Waymo’s Motion	Entire Document	Defendants

3. Waymo’s Motion and exhibits contain information that Defendants and/or Mr. Kalanick have designated as confidential and/or highly confidential.

4. Waymo takes no position on the merits of sealing Defendants’ designated material, and expects Defendants to file one or more declarations in accordance with the Local Rules.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that this declaration was executed in San Francisco, California, on August 7, 2017.

By /s/ Lindsay Cooper

Lindsay Cooper
Attorneys for WAYMO LLC

SIGNATURE ATTESTATION

Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the filing of this document has been obtained from Lindsay Cooper.

/s/ Charles K. Verhoeven
Charles K. Verhoeven